

23 September 2026

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23/09/2026
TOOWOOMBA
REGIONAL COUNCIL

State Assessment and Referral Agency (SARA)
Darling Downs and South West
PO Box 825
TOOWOOMBA QLD 4350

Cc: The Assessment Manager
Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

Dear Sir/Madam

REFERRAL OF DEVELOPMENT APPLICATION – SECTION 54 PLANNING ACT 2016 – DEVELOPMENT APPLICATION - MATERIAL CHANGE OF USE - TRANSPORT DEPOT & WAREHOUSE – 251-253 O'MARA ROAD, WELLCAMP - LOT 9 SP281276, LOT 10 SP281276, EMT A SP302940, EMT C SP346515 (Council Ref: MCUI/2026/8283)
(Our Ref: 2025-638)

I act for the applicants, A1 Earthworks Qld Pty Ltd, in the above matter.

Please find attached documentation associated with a Development Application for a Development Permit for Material Change of Use for Transport Depot, and Warehouse on land at 251-253 O'Mara Road, Wellcamp, described as Lot 9 SP281276, Lot 10 SP281276 including Easement A SP302940 and Easement C SP346515.

Toowoomba Regional Council (**Council**) has identified that this development triggers referral to the State Assessment and Referral Agency (SARA) pursuant to section 54 of the *Planning Act 2016* on the following basis:

PA REGULATION	REFERRAL TRIGGER
SEQ REGIONAL LANDSCAPE AND RURAL PRODUCTION AREA AND SEQ RURAL LIVING AREA	
Urban activity	
Schedule 10, Part 16, Division 6, Subdivision 4 Table 2, Item 1	Development application for a material change of use of premises that is assessable development under section 27E, 27EA, or 27F.

The Department has Concurrence Agency jurisdiction in the assessment of the application.

Notwithstanding this, the applicant contends that the development does not exceed the thresholds under sections 27E, 27EA or 27F. Under the settlement pattern identified in ShapingSEQ 2023, the site has been included within the Regional Landscape and Rural Production Area. The Regional Landscape and Rural Production Area (**RLRPA**) is intended to protect rural land from urban and rural residential development in order to preserve the agricultural, natural and cultural features of the area and support the development and economic growth of rural communities and industries.

It is noted that the subject site is not used or suitable for rural or agricultural activities and does not contain important environmental, natural, scenic amenity, cultural or landscape values. The subject site does not directly adjoin properties with high-value rural or agricultural activities or other important values, and as such, the proposed development will not compromise environmental, natural, scenic amenity, cultural or landscape values, or other values sought to be protected under the RLRPA.

With respect to referral triggers in the Regulation, the proposal involves an Urban Activity within the RLRPA. Notwithstanding this, the proposed development does not exceed the thresholds as identified under Schedule 10, Part 16, Division 6 and 7 of the *Planning Regulation 2016* (**the Regulation**). The relevant assessment triggers and associated size thresholds are reproduced in the table below.

Section	Development Type	Gross Floor Area (GFA) Threshold	Outdoor Use Threshold
Schedule 10, Part 16, Division 6, Subdivision 2, Section 27EA	Transport Depot	800m ²	4,000m ²
Schedule 10, Part 16, Division 6, Subdivision 2, Section 27F	Another Urban Activity	800m ²	1,500m ²
Schedule 10, Part 16, Division 7, Subdivision 1, Section 27G	Combined Uses (for 2 or more urban activities)	800m ² (for two or more urban activities)	N/A

For clarity, the definition of Gross Floor Area (**GFA**) per Schedule 24 of the Regulation has been reproduced as follows:

gross floor area, for a building, means the total floor area of all storeys of the building, measured from the outside of the external walls and the centre of any common walls of the building, other than areas used for—

- (a) building services, plant or equipment; or
- (b) access between levels; or
- (c) a ground floor public lobby; or
- (d) a mall; or
- (e) parking, loading or manoeuvring vehicles; or
- (f) unenclosed private balconies, whether roofed or not.

Gross Floor Area Calculation

As Section 27G (Combined Uses) is applicable to the calculation of GFA, the proposed development is not subject to the GFA threshold in either Section 27EA or Section 27F. The proposed development can include up to 800m² combined total GFA prior to requiring a referral.

The proposed development includes an office building (165m²) and a commercial shed (1,455m²). As illustrated on the site plan in **Appendix D**, the shed will be clearly delineated into two main use areas, being warehouse storage (associated with the warehouse) and parking, storage, loading and manoeuvring vehicles (associated with the transport depot). Per the definition of GFA, this use area associated with the transport depot is not included in the GFA calculation. The warehouse storage component is 510m² and, combined with the office, results in a total GFA of 675m² on the site. Accordingly, the proposed development does not exceed the trigger for GFA.

Outdoor Use Area Calculation

Section 27G does not include a relevant threshold for outdoor use area for combined uses. Accordingly, the outdoor use area thresholds from Section 27EA and Section 27F have been applied. This is calculated as 4,000m² for the Transport Depot and 1,500m² for the Warehouse respectively.

The proposed development includes 1,498m² of outdoor storage space, associated with the warehouse use. The proposed development also includes 3,970m² which is predominately made up of ingress/egress, parking, loading, storage and manoeuvring for both passenger and heavy vehicles associated with the transport depot. The proposed development therefore does not exceed the thresholds for outdoor use areas.

Accordingly, the proposed development does not exceed the thresholds in the Regulation, will not trigger a referral to the State, and will not compromise the outcomes sought under the South East Queensland Regional Plan.

The following documents are attached for your consideration:

- The Amended Confirmation Notice;
- DA Form 1 and Owners Consent; and
- The Development Application including the Planning Report and Development Plans.

Should you require any additional information please do not hesitate to contact the undersigned on 0481 127 412 or (07) 4632 2535.

Yours sincerely

A handwritten signature in black ink, appearing to read "James Williams", with a stylized flourish at the end.

James Williams
Precinct Urban Planning